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United States of America
13

14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.

19 PAUL EDWARD BELL,
aka "J-Roc,"
20 aka "Jay-Roc,"
21 aka "Best Choice,"
aka "Jay the Truth,"
22 aka "Rich Rollin,"
aka "Jay Rich,"
23

24 Defendant.
25

ED CR. No. 12-00057(A)-VAP

JOINT PROPOSED SUMMARY OF THE
CASE

TRIAL DATE: January 7, 2014
TIME: 9:00 a.m.
PLACE: Courtroom of the Hon.
Virginia A. Phillips

26 Plaintiff United States of America, by and through its
27 counsel of record and defendant Paul Edward Bell, through his
28

1 counsel of record, hereby propose the following Summary of the
2 Case be read to the jury in the above captioned matter.

3
4 Dated: January 2, 2014

Respectfully submitted,

5 ANDRÉ BIROTTE JR.
6 United States Attorney

7 ANTOINE F. RAPHAEL
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9 /s/ Ami Sheth
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12 /s/ Michael W. Grant
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15 SEAN K. KENNEDY
16 Federal Public Defendant

17 /s/ Jeffrey A. Aaron
18 JEFFREY A. AARON
19 Deputy Federal Public Defender
Attorney for Paul Bell

20 /s/ David I. Wasserman
21 DAVID I. WASSERMAN
22 Deputy Federal Public Defender
Attorney for Paul Bell
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JOINT SUMMARY OF THE CASE

In summary, the government alleges in Count One of the First Superseding Indictment that from around 2011 and continuing to around 2012, in Los Angeles and Riverside counties, defendant Paul Edward Bell engaged in a sex trafficking conspiracy with other individuals, whereby Mr. Bell and others would recruit, transport, harbor and employ females to engage in prostitution activities resulting in a financial benefit to Mr. Bell and other members of the conspiracy. The government also alleges that some of these females were minors (under the age of 18 years) and that Mr. Bell knew or recklessly disregarded that fact. Furthermore, the government alleges that Mr. Bell used force, fraud, and coercion to cause the females to work for Bell and others as prostitutes. Specifically, in Counts Two through Five of the Indictment, the government alleges that Mr. Bell caused four females, all of whom had not yet attained the age of 18 years, with the initials T.S., S.C., A.D., and Y.S. to engage in prostitution activities for which Mr. Bell and others received financial benefit, and that Mr. Bell knew, or recklessly disregarded the fact, that they were under the age of 18, and that Mr. Bell used force, fraud, and coercion to cause them to work for him and others as prostitutes.

[Furthermore, the parties agree that Mr. Bell was previously convicted of a felony for which he received a term of imprisonment exceeding one year. The government further alleges, in Count Six of the Indictment, that after having been

1 convicted of the felony, Mr. Bell illegally possessed a firearm
2 that had previously traveled in interstate or foreign
3 commerce.]*

4 Mr. Bell denies all the charges and has entered pleas of
5 not guilty.

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23 *The bracketed portion should not be read if defendant Paul
24 Edward Bell pleads guilty to Count Six if the First Superseding
25 Indictment.

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27 [END OF JOINT SUMMARY OF THE CASE]
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